

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IpLEARN, LLC,

Plaintiff,

v.

WBT SYSTEMS, LTD., *et al.*,

Defendants.

Civil Action No. 11-825-LPS

DEMAND FOR JURY TRIAL

IpLEARN, LLC'S ANSWER TO DEFENDANT CENGAGE LEARNING, INC.'S

COUNTERCLAIM

Plaintiff IpLearn, LLC (“IpLearn”), by and through its undersigned attorneys, answers the counterclaim of Defendant Cengage Learning, Inc. (“Cengage”) by corresponding paragraph number as follows:

THE PARTIES

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. IpLearn admits that Cengage purports to seek declaratory relief arising under the Declaratory Judgment Act and the Patent Laws of the United States, but IpLearn denies that Cengage is entitled to any such relief. IpLearn admits that the Court has jurisdiction over the subject matter of the Cengage's counterclaim.

4. IpLearn admits that an actual and continuing controversy exists between the parties with respect to the validity and infringement of the '888, '486, and '556 patents.

5. Admitted.
6. Admitted.

COUNT ONE

7. Admitted.
8. Denied.
9. Denied.

PRAYER FOR RELIEF

WHEREFORE, IpLearn prays for the following relief with regard to Cengage's counterclaim:

- A. A dismissal with prejudice of Cengage's counterclaim;
- B. An adjudication that Cengage is not entitled to any relief on its counterclaim, including, without limitation, any fine or damages; and
- C. Costs and such further relief to which IpLearn is entitled, and which the Court deems just and equitable.

DEMAND FOR JURY TRIAL

IpLearn demands a trial by jury on all issues so triable.

January 6, 2012

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Arthur G. Connolly, III

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